WYC:TJS

M-11-030

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - - - - - - - - - - - - X

UNITED STATES OF AMERICA

- against -

WOLF JACOBOWITZ,
also known as
"Kalman Schlesinger,"

Defendant.

- - - - - - - - - - - - - - - - X

COMPLAINT ~~AND AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR ARREST WARRANT~~

(18 U.S.C. § 1542)

EASTERN DISTRICT OF NEW YORK, SS:

JOHN PAGE, being duly sworn, deposes and says that he is a Special Agent with the Department of State, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

On or about June 9, 2004, within the Eastern District of New York, the defendant WOLF JACOBOWITZ, also known as "Kalman Schlesinger," did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws.

(Title 18, United States Code, Section 1542).

The source of your deponent's information and the grounds for his belief are as follows:[1/]

1. I am a Special Agent with DSS and have been so for approximately 2 years. I am familiar with the facts and circumstances set forth below from my personal involvement in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On or about June 9, 2004, the defendant WOLF JACOBOWITZ, also known as "Kalman Schlesinger,"[2/] applied for a United States Passport. On the application, the defendant provided the name, date of birth and place of birth of another person as his own. Specifically, the defendant stated that his name was John Doe and that his place of birth was Brooklyn, New York.

3. The defendant filled out his home address on the passport application as 806 Eastern Parkway, Brooklyn, New York. The United States Depart of State subsequently mailed a United States Passport to that address pursuant to this application.

[1/] Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

[2/] The defendant previously went by the name "Kalman Schlesinger" and went by that name at the time of his deportation.

4. On June 28, 2010, the true John Doe executed an application for a United States Passport in Brooklyn, New York. During the course of verifying the information provided by John Doe, the United States Department of State fraud prevention manager found that a passport had previously been issued in that name and to an individual claiming the same date of birth and social security number.

5. On December 3, 2010, the defendant WOLF JACOBOWITZ attempted to exit the United States and enter Canada at Champlain, New York. He presented a passport in the name of John Doe, which bore a picture of the defendant. In the defendant's luggage, Canadian authorities found an Israeli passport in the name of WOLF JACOBOWITZ. Canadian authorities denied him entry and transported him back to the United States for arrest pursuant to an outstanding bench warrant for WOLF JACOBOWITZ.[3/] A search of DSS records indicates that the United States Passport in the defendant's possession was the one issued pursuant to the fraudulent application dated June 9, 2004.

[3/] The bench warrant stemmed from a violation of supervised release alleging that the defendant had failed to appear for a scheduled meeting with probation officers.

WHEREFORE, your deponent respectfully requests that the defendant WOLF JACOBOWITZ, also known as "Kalman Schlesinger," be dealt with according to law.

JOHN PAGE
Special Agent
Department of State
Diplomatic Security Service

Sworn to before ~~me~~ this
13th day of January, 2011

s/ Go

UNITED STAT
EASTERN DIS